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7	UNITED STATES DISTRICT COURT	
8	EASTERN DISTRICT OF CALIFORNIA	
9		
10	BARBARA L. BONKOFSKY,	Case No. 2:23-cv-02690-AC
11	Plaintiff,	JOINT STIPULATION AND
12	v.	[ <del>PROPOSED</del> ] ORDER FOR EXTENSION OF TIME FOR PLAINTIFF TO FILE
13	COMMISSIONER OF SOCIAL SECURITY,	MOTION FOR SUMMARY JUDGMENT
14	Defendant.	
15		
16 17	IT IS HEREBY STIPULATED, by the parties, through their respective counsel	
18	of record, that the deadline for Plaintiff to file her Motion for Summary Judgment shall	
19	be extended from February 15, 2024 to <b>February 29, 2024</b> . In support of this request,	
20	Plaintiff's counsel states as follows:	
21	1. This is plaintiff's first request for an extension in this matter.	
22	2. Plaintiff's Motion for Summary Judgement is currently due February 15,	
23	2024.	
24		D1 : .: .: .:
25	3. Good cause exists for this request, as Plaintiff's counsel recently returned	
26	from long-planned travel which interfered with his ability to timely	
27	complete Plaintiff's Motion for Summary Judgment.	
28	Joint Stip. and PO for Ext. 2:23-cv-02690-AC	1

## 1 4. In addition to his work on this case, Plaintiff's counsel is also currently 2 briefing a complex case before the Ninth Circuit Court of Appeals and 3 preparing a legal education training presentation. 4 5. Plaintiff's counsel is s a true solo attorney that has no staff to assist him in 5 the day-to-day operation of his law firm or assist him with the briefing of 6 cases. 7 6. Plaintiff's counsel makes this request in good faith with no intention of 8 9 unduly delaying these proceedings. 10 The parties further stipulate that the Court's Scheduling Order shall be modified 11 accordingly. 12 Respectfully submitted, 13 Dated: February 13, 2024 /s/ John D. Metsker 14 JOHN D. METSKER Attorney for Plaintiff 15 16 Dated: February 14, 2024 /s/ Edmund Darcher\* 17 EDMUND DARCHER Special Assistant U.S. Attorney 18 (\*as authorized by email) Attorney for Defendant 19 20 21 [PROPOSED] ORDER: 22 Pursuant to the agreement of the parties, and good cause being found, the deadline for Plaintiff to file her Motion for Summary Judgement shall be extended to February 29, 23 2024. 24 APPROVED AND SO ORDERED. 25 Dated: February 15, 2024 26 27 UNITED STATES MAGISTRATE JUDGE 28 2 Joint Stip. and PO for Ext. 2:23-cv-02690-AC